

David Abrams, Attorney at Law 3051604(NY)
PO Box 3353 Church Street Station
New York, NY 10008
212-897-5821 dnabrams@gmail.com

United States District Court
Eastern District of Missouri

United States of America ex rel.)	<u>TO BE FILED UNDER</u>
GNGH2 Inc.,)	<u>SEAL</u>
Plaintiff-Relator,)	
- against -)	No. 4:24-cv-00823-HEA
VSM ABRASIVES CORPORATION,)	
Defendant.)	

Notice of Voluntary Dismissal

Pursuant to Fed.R.Civ.P. 41(a), Relator voluntarily dismisses its *qui tam* Complaint without prejudice. Notably, because the Complaint was filed under the False Claims Act (FCA), the Complaint may only be dismissed if the government gives written consent to the Relator's dismissal and the reasons for the consent. 31 U.S.C. § 3730(b)(1). The United States Attorney's Office has represented to Relator's counsel that immediately upon filing of this voluntary dismissal the government will be separately filing its consent to the dismissal setting forth the reasons for the consent. Thus, Relator requests that the Court refrain from

dismissing the Complaint until after the government informs this Court of its consent as required by the FCA.

Respectfully submitted,



David Abrams, Attorney at Law 3051604(NY)
Attorney for Relator
GNGH2 Inc.

PO Box 3353 Church Street Station
New York, NY 10008
Tel. 212-897-5821
Fax 212-897-5811

Dated: Delhi, New York
October 24, 2024

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OCT 29 2024

BY MAIL

David Abrams, Attorney at Law

P.O. Box 3353, Church Street Station, New York, NY 10008

Tel. 212-897-5821 Fax 212-897-5811

Delhi, New York

June 11, 2024

To: Clerk of the Court
United States District Court
Eastern District of Missouri
111 South 10th Street
St. Louis, MO 63102

Re: United States ex rel. GNGH2, Inc v. VSM Abrasives Inc.
No. 4:24-cv-00823-HEA

Dear Sir / Madam:

This office represents the Relator in the above-referenced matter. Please find enclosed for filing a Notice of Voluntary Dismissal. Thank you for your attention to this matter.

Sincerely yours,



David Abrams

Enclosure

cc: Suzanne J. Moore, Esq.

(by electronic mail w/ enc.)

David Abrams, Attorney at Law
Church Street Station
P.O. Box 3353
New York, NY 10008

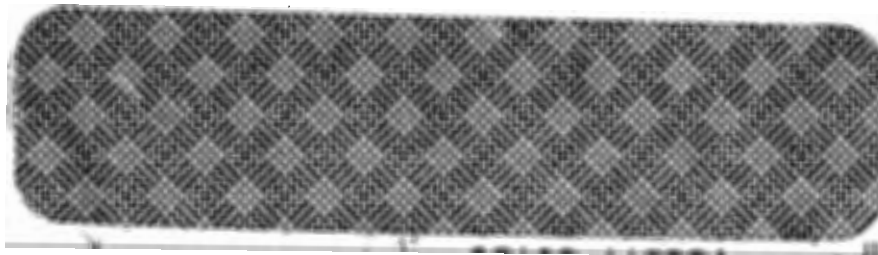
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